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JUL 30 2018

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ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF MONTANA
 BILLINGS DIVISION**

<p>UNITED STATES OF AMERICA,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>APRIL DRAKE GREER,</p> <p style="text-align: center;">Defendant.</p>	<p>CR 18-99-BLG-SPW</p> <p>AMENDED INFORMATION</p> <p>WIRE FRAUD (Counts I-IV) Title 18 U.S.C. § 1343 (Penalty: 20 years imprisonment, \$250,000 fine, and three years supervised release)</p>
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COUNTS I-IV

That beginning in or about 2010, and continuing thereafter until on or about June 7, 2017, at Red Lodge, in the State and District of Montana, and elsewhere, the defendant, APRIL DRAKE GREER, devised a material scheme and artifice to obtain money by false and fraudulent pretenses, representations, and promises, said

scheme being more specifically described below, and thereafter to execute the scheme and artifice so devised, transmitted and caused to be transmitted by wire communication in interstate commerce, certain signals, writings and sounds.

THE ACH TRANSFER SCHEME

During the period of the scheme, APRIL DRAKE GREER was employed as the director of human resources and controller for Wildfire Defense Systems, Inc., a company owned and operated in Red Lodge. In this capacity, Greer was responsible for accounts receivable, accounts payable, bill payment, human resources management, and reconciliation of bank statements. As part of her duties, GREER regularly utilized the software program QuickBooks. Wildfire Defense Systems, Inc. used QuickBooks for many of their accounting and payroll functions. Among other features, the QuickBooks software was able to access a bank account belonging Wildfire Defense Systems, Inc. and transfer money to another account via an ACH electronic wire. Used legitimately, this function enabled Greer and other responsible employees to pay employees and other subcontractors for their services.

As part of the scheme, GREER regularly used the QuickBooks Program to transfer money from the Wildfire Defense Systems, Inc. account to her personal checking account without authorization. To conceal the missing money GREER

withdrew from her employer's account, GREER improperly altered bank statements when necessary. GREER also fraudulently coded the payments within QuickBooks to make it appear that the payments were related to business expenses. Over the course of approximately seven years, GREER stole approximately \$1,432,372.00 in embezzled funds from Wildfire Defense Systems, Inc.

INTERSTATE WIRING

COUNT I

On or about January 27, 2017, at Red Lodge, in the State and District of Montana, the defendant, APRIL DRAKE GREER, for the purpose of executing the scheme described above, did knowingly cause to be transmitted in interstate commerce by means of wire communications, an electronic transmission between JP Morgan Chase Bank in New York, NY and First Interstate Bank in Montana, which represented the transfer of \$9,312.35 to First Interstate Bank account number XX-XXXX-2362, all in violation of 18 U.S.C. § 1343.

COUNT II

On or about January 27, 2017, at Red Lodge, in the State and District of Montana, the defendant, APRIL DRAKE GREER, for the purpose of executing the scheme described above, did knowingly cause to be transmitted in interstate commerce by means of wire communications, an electronic transmission between

JP Morgan Chase Bank in New York, NY and First Interstate Bank in Montana, which represented the transfer of \$9,961.95 to the First Interstate Bank account number XX-XXXX-2362, all in violation of 18 U.S.C. § 1343.

COUNT III

On or about February 14, 2017, at Red Lodge, in the State and District of Montana, the defendant, APRIL DRAKE GREER, for the purpose of executing the scheme described above, did knowingly cause to be transmitted in interstate commerce by means of wire communications, an electronic transmission between JP Morgan Chase Bank in New York, NY and First Interstate Bank in Montana, which represented the transfer of \$9,710.62 to First Interstate Bank account number XX-XXXX-2362, all in violation of 18 U.S.C. § 1343.

COUNT IV

On or about February 14, 2017, at Red Lodge, in the State and District of Montana, the defendant, APRIL DRAKE GREER, for the purpose of executing the scheme described above, did knowingly cause to be transmitted in interstate commerce by means of wire communications, an electronic transmission between JP Morgan Chase Bank in New York, NY and First Interstate Bank in Montana, which represented the transfer of \$8,680.95 to the First Interstate Bank account number XX-XXXX-2362, all in violation of 18 U.S.C. § 1343.

DATED this 30th day of July 2018.

KURT G. ALME
United States Attorney


COLIN M. RUBICH

Assistant U.S. Attorney


KURT G. ALME

United States Attorney


for: JOSEPH E. THAGGARD
Criminal Chief Assistant U.S. Attorney

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